



Linda S. Vandeloop  
Director  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street NW  
Suite 1000  
Washington, D.C. 20036

202-457-3033 Phone  
202-457-3072 Fax  
linda.vandeloop@att.com

June 25, 2008

**EX PARTE NOTICE**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W. - Room TW-A325  
Washington, D.C. 20554

**Re: Petition of AT&T Inc. For Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements, WC Docket No. 07-139; 2000 Biennial Regulatory Review -- Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2 and Phase 3, CC Docket No. 00-199; In the Matter of Local Telephone Competition and Broadband Reporting, WC Docket No. 04-141**

Dear Ms. Dortch:

On June 24, 2008, Frank Simone, Theodore Marcus, and the undersigned on behalf of AT&T met with Rodger Woock, Darryl Cooper, Jim Eisner, Alan Feldman, Michael Goldstein, Jim Lande, Jeremy Miller, and Cathy Zima (via telephone) of the Wireline Competition Bureau regarding the above-referenced proceedings. AT&T provided an overview of the issues it raised in its forbearance petition.

Specifically, AT&T stressed that these reporting requirements, which were put in place nearly 20 years ago to monitor the transition to price caps and were designed to detect any detrimental impact on network investment, are no longer necessary. The Commission's predictive judgment that price cap regulation would spur investment has been confirmed by the billions of dollars invested by price cap carriers, including AT&T, to upgrade their networks since the early 1990s. AT&T also stressed that in the current communications environment, where competition exists among multiple carriers using varying technologies, it no longer makes sense for the Commission to collect the data at issue only from a small subset of carriers. Further, as AT&T proposed in its June 10, 2008 *ex parte* letter, if the Commission determines it has an appropriate need to continue to collect all or some data currently reported in ARMIS reports 43-07 and 43-08, it should collect it from all wireline carriers *via* the Form 477. AT&T pointed out that the Commission opened a rulemaking in 2000 to evaluate whether to move all reporting to the Form 477 and that rulemaking is still open.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically with the Commission. If you have any questions, please contact me on (202) 457-3033.

Sincerely

/s/ Linda S. Vandeloop

ATTACHMENT

cc: Rodger Woock  
Darryl Cooper  
Jim Eisner  
Alan Feldman  
Michael Goldstein  
Jim Lande  
Jeremy Miller  
Cathy Zima

# ARMIS Forbearance Petition



## Original Purpose of ARMIS Reporting

- To monitor Service Quality and Infrastructure Development under Price Caps and to ensure that Price Cap ILECs could not increase profits by lowering the quality of service.
- To standardize reporting requirements and to monitor network growth, usage and reliability.

# ARMIS Forbearance

Price caps have been in effect for nearly 20 years. Experience shows that that price cap-regulated carriers have no incentive to sacrifice quality to increase short-term profits.

Only 3 – 11 wireline ILECs report data (e.g., switches and fiber), but other carriers have facilities. Without the total industry data, infrastructure information reported by only the ILECs is incomplete. Requiring information that today is reported in ARMIS, be reported in the 477 from the more than 1,000 wireline carriers who provide the data would be more meaningful.

Only some ILECs report service quality on ARMIS. But more comprehensive total industry data as is currently collected via the state and FCC complaint processes or by 3<sup>rd</sup> party customer surveys.

In the current communications environment, where competition exists among multiple carriers using varying technologies, 21st Century Reporting must eliminate asymmetric reporting requirements

# ARMIS Forbearance Petition – Relief Requested

## Service Quality Data (43-05)

Measurement of service quality including

- Installation & Repair intervals
- Common trunk blockage reports
- Total Switch Downtime
- Occurrences of 2 minutes or more downtime
- Customer Service Quality complaints

## Customer Satisfaction Data (43-06)

- Provides the results of H.F.C.' customer satisfaction surveys.

## Infrastructure Data (43-07)

- Number of Local switches
- Length of loop and transport facilities by cable type (e.g. sheath kilometers of copper cable)

## Operating Data (43-08)

- Outside Plant Statistics (e.g. kilometers of aerial cable)
- Access Lines in Svc (by state)
- Call volumes by state.



at&t